

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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03-MDL-1570 (GBD)(SN)

In Re:

TERROR ATTACKS ON
SEPTEMBER 11, 2001

**IRAN NOTICE
OF AMENDMENT**

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This document relates to:

Ashton, et al. v. al Qaeda Islamic Army, et al., Case No. 02-cv-6977 (GBD)(SN)

Bauer, et al. v. al Qaeda Islamic Army, et al., Case No. 02-cv-7236 (GBD)(SN)

York, et al. v. al Qaeda Islamic Army, et al., Case No. 03-cv-5493 (GBD)(SN)

Plaintiffs file this Notice of Amendment with respect to the underlying Complaint in the above-referenced matter, ECF No. 3237, as permitted and approved by the Court's Order of July 10, 2018, ECF No. 4045. Upon the filing of this Notice of Amendment, the underlying Complaint is deemed amended to add the individual(s) listed below (the "New Plaintiff(s)") as plaintiff(s) raising claims against the Islamic Republic of Iran. The underlying Complaint is deemed amended to include the allegations, as indicated below, of (a) the Federal Insurance and Ashton Plaintiffs' Amended Consolidated Complaint Against Defendant, the Islamic Republic of Iran, ECF No. 3237, or (b) the Amended Complaint, Burnett v. Islamic Republic of Iran, No. 15-CV-9903 (GBD)(SN) (S.D.N.Y. Feb. 8, 2016), ECF No. 53. The amendment effected through this Notice of Amendment supplements by incorporation into, but does not displace, the underlying Complaint. This Notice of Amendment relates solely to the Islamic Republic of Iran and does not apply to any other defendant.

Upon filing this Iran Notice of Amendment, each New Plaintiff is deemed to have adopted all factual and jurisdictional allegations of the complaint that has been joined as specified below; all causes of action contained within that complaint; all prior filings in

connection with that complaint; and all prior Orders and rulings of the Court in connection with that complaint.

Additionally, each New Plaintiff incorporates the factual allegations and findings contained in those pleadings and orders filed at Havlish v. Bin Laden, No. 1:03-CV-9848 (GBD)(SN) (S.D.N.Y.), ECF Nos. 263, 294, 295; In re Terrorist Attacks on September 11, 2001, 03-MDL-1570 (GBD)(SN) (S.D.N.Y.), ECF Nos. 2430, 2431, 2432, 2433, 2473, 2515, 2516; and evidence submitted at the proceedings before the Honorable George B. Daniels on December 15, 2011 (ECF No. 2540).

CAUSES OF ACTION

Each New Plaintiff hereby adopts and incorporates herein by reference all factual allegations, jurisdictional allegations, and jury trial demand, including all causes of action against Iran, as set forth in the following complaint [**check only one complaint**]:

- Federal Insurance and Ashton Plaintiffs' Amended Consolidated Complaint Against Defendant, the Islamic Republic of Iran, ECF No. 3237
- Amended Complaint, Burnett v. Islamic Republic of Iran, No. 15-CV-9903 (GBD)(SN) (S.D.N.Y. Feb. 8, 2016), ECF No. 53

IDENTIFICATION OF NEW PLAINTIFFS

Each New Plaintiff is or was a survivor of a person who died due to the terrorist attacks of September 11, 2001. For each New Plaintiff, the following chart lists the New Plaintiff's name, the New Plaintiff's residency and nationality, the name of the New Plaintiff's deceased family member, the New Plaintiff's relationship to the decedent, and the paragraph(s) of the underlying Complaint discussing the decedent and/or the decedent's estate.

	New Plaintiff's Name (alphabetical by last name)	New Plaintiff's State of Residency at Filing (or death)	New Plaintiff's Citizenship/Nationality on 9/11/2001	9/11 Decedent's Name	New Plaintiff's Relationship to 9/11 Decedent	Paragraphs of Complaint Discussing 9/11 Decedent
1	Brady, Joan	New Jersey	U.S. Citizen	John A. Candela	Sister	<i>Bauer action</i> ¹ Paragraph 9
2	Mee, Est. of Karen A.	New Jersey	U.S. Citizen	John A. Candela	Sister	<i>Bauer action</i> Paragraph 9
3	Mennona, Heidi	New Jersey	U.S. Citizen	David R. Meyer	Daughter	<i>Bauer action</i> Paragraph 15
4	Meyer, Charles	New Jersey	U.S. Citizen	David R. Meyer	Brother	<i>Bauer action</i> Paragraph 15
5	Meyer, Kristine	New Jersey	U.S. Citizen	David R. Meyer	Sister	<i>Bauer action</i> Paragraph 15
6	Meyer, Margaret	New Jersey	U.S. Citizen	David R. Meyer	Wife	<i>Bauer action</i> Paragraph 15
7	Meyer-Fuchs, Dawn	New Jersey	U.S. Citizen	David R. Meyer	Daughter	<i>Bauer action</i> Paragraph 15
8	Montanaro, Est. of Frank	New York	U.S. Citizen	Kristen L. Montanaro	Father	<i>Bauer action</i> Paragraph 24
9	Montanaro, Jamie	New York	U.S. Citizen	Kristen L. Montanaro	Sister	<i>Bauer action</i> Paragraph 24
10	Montanaro, Karen	New York	U.S. Citizen	Kristen L. Montanaro	Sister	<i>Bauer action</i> Paragraph 24
11	Murphy, Beth K.	New York	U.S. Citizen	Kevin Murphy	Wife	<i>Bauer action</i> Paragraph 11
12	Murphy, Caitlyn B.	New York	U.S. Citizen	Kevin Murphy	Daughter	<i>Bauer action</i> Paragraph 11
13	Murphy, Connor J.	New York	U.S. Citizen	Kevin Murphy	Son	<i>Bauer action</i> Paragraph 11
14	Murphy, John F.	Massachusetts	U.S. Citizen	Kevin Murphy	Brother	<i>Bauer action</i> Paragraph 11

¹ *Bauer, et al. v. al Qaeda Islamic Army, et al.*, Case No. 02-cv-7236 (GBD)(SN), herein referred to as *Bauer action*, was consolidated into the *Ashton* action in the *Ashton* First Amended Consolidated Master Complaint filed on 08/01/2003, ECF No. 32.

15	Murphy, Michael J.	Ohio	U.S. Citizen	Kevin Murphy	Brother	<i>Bauer</i> action Paragraph 11
16	Murphy, Jr., Est. of Timothy F.	North Carolina	U.S. Citizen	Kevin Murphy	Father	<i>Bauer</i> action Paragraph 11
17	Murphy, Timothy P.	New York	U.S. Citizen	Kevin Murphy	Brother	<i>Bauer</i> action Paragraph 11
18	Nebbia, Jean	Florida	U.S. Citizen	Steven F. Schlag	Sister	<i>Bauer</i> action Paragraph 10
19	Orsini, Arlene	New Jersey	U.S. Citizen	Ronald Orsini	Wife	<i>Bauer</i> action Paragraph 17
20	Orsini, Est. of Robert	Nevada	U.S. Citizen	Ronald Orsini	Brother	<i>Bauer</i> action Paragraph 17
21	Pandolfi, Danielle	New Jersey	U.S. Citizen	Ronald Orsini	Daughter	<i>Bauer</i> action Paragraph 17
22	Parris, Aubrey	New York	U.S. Citizen	Colin Bonnett	Father	<i>Bauer</i> action Paragraph 6
23	Passareta, Pamela	Wash., D.C.	U.S. Citizen	Adam J. Lewis	Sister	<i>York</i> action ² Paragraph 7
24	Penavic, Suzanne J.	New York	U.S. Citizen	Joseph Sisolak	Wife	<i>Bauer</i> action Paragraph 54
25	Powell, Anna J.	New York	U.S. Citizen	Joseph Sisolak	Mother	<i>Bauer</i> action Paragraph 54

Dated: December 2, 2021

Respectfully submitted,

BAUMEISTER & SAMUELS, P.C.

/s/ Dorothea M. Capone
 COUNSEL FOR PLAINTIFFS
 140 Broadway, 46th Floor
 New York, NY 10005
 Phone: (212) 363-1200
 Email: tcapone@baumeisterlaw.com

² *York, et al. v. al Qaeda Islamic Army, et al.*, Case No. 03-cv-5493 (GBD)(SN), herein referred to as *York* action, was consolidated into the *Ashton* action in the *Ashton* First Amended Consolidated Master Complaint filed on 08/01/2003, ECF No. 32.